

REMARKS/ARGUMENTS

Claims 1-10, 12-23, 25-36, and 38-39 are pending in the application. Claims 1-2, 6-8, 12, 14-15, 19-21, 25, 27-28, 32-34, 36, and 38 have been amended. Claims 11, 24, and 37 have been cancelled. Reconsideration is respectfully requested. Applicants submit that the pending claims 1-10, 12-23, 25-36, and 38-39 are patentable over the art of record and allowance is respectfully requested of claims 1-10, 12-23, 25-36, and 38-39.

Applicants would like to thank Examiner Misiura for holding a telephone interview with their representative, Janaki K. Davda, on March 13, 2006, at 2:30 p.m. (EST). Claims 1-2 and the Kagan patent were discussed. Applicants' representative suggested amending claim 1 incorporate some of the language of claim 2 to clarify that the state of one event data structure determines when events are written and when interrupts are issued. In particular, with Applicants' invention, an event entry is written into the event data structure when the state of the event data structure is one of armed or unarmed and an interrupt is issued when the state of the event data structure is armed. Applicants' representative pointed to Figure 2 of Applicants' drawings as showing a single structure. Applicants' representative also discussed page 6, paragraphs 68 and 69 of the Kagan patent as describing that an event is written to the event queue when the state of the completion queue is armed. Applicants' representative submitted that the use of two queues does not anticipate the claimed single event data structure. No agreement was reached.

Applicants also discussed amendments to claim 6 to place claim 6 and dependent claims in condition for allowance.

Applicants would like to thank the Examiner for indicating that claims 7-13, 20-25, and 33-39 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Applicants have amended independent claims 6, 19, and 32 to incorporate the language of claims 11, 23, and 37, respectively. Claims 11, 24, and 37 have been cancelled. Claims 9, 10, 12, 13, 22, 23, 25, 26, 35, 36, 38, and 39 depend from one of claims 6, 19, and 32.

Claims 7, 20, and 33 have been amended to incorporate the language of the claims from which they depend, and claims 8, 21, and 34 have been amended to depend from claims 7, 20, and 33, respectively.

Therefore, Applicants respectfully submit that claims 6-13, 19-25, and 32-39 are now in condition for allowance.

Claims 2, 15, and 28 were objected to. Applicants have amended the claims to overcome the rejection and to place them in better form.

Claims 14 and 19 were objected to. Applicants have amended the claims to overcome the rejection and to place them in better form.

Claims 1-6, 14-19, and 27-32 are rejected under 35 U.S.C. 102(b) as being anticipated by Kagan et al. (U.S. Patent Application No. 2003/0065856). Applicants respectfully traverse.

Anticipation requires that the identical invention must be shown in a single reference in as complete detail as is contained in the claims. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Applicants respectfully submit that the Kagan patent application does not teach the identical invention claimed by Applicants.

Claim 1 describes a method for interrupt processing in which it is determined that an event has occurred. A state of an event data structure is determined, wherein the event data structure includes one or more entries, and wherein each of the entries is capable of storing event specific parameters and an event code field that identifies at least one of an event source and function of an I/O device (e.g., Applicants' Specification, page 5, paragraph 19). Then, an event entry is written into the event data structure in response to determining that the event has occurred and based on the state of the event data structure (e.g., Applicants' Specification, page 7, paragraphs 27-28).

The Examiner submits that the 'event data structure' of Kagan comprises the combination of the completion queues and event queues. Applicants respectfully traverse. The use of two queues is not identical to the claimed use of a single structure. In particular, the Kagan patent application describes that when the completion queue is in armed state, existence of a CQE in the queue will cause the HCA to write an event entry to the appropriate event queue (page 6,

paragraph 68), and a given event queue will assert its corresponding interrupt only when the event queue is in armed state (page 6, paragraph 69). That is, the state of the completion queue is checked to determine whether to write to the event queue, which does not anticipate writing an event entry into the event data structure in response to determining that the event has occurred and based on the state of the event data structure.

Claims 14 and 27 are not anticipated by the Kagan patent application for at least the same reasons as were discussed with respect to claim 1. Furthermore, claims 14 and 27 describe an Input/Output device that is operable to perform the claimed elements.

Dependent claims 2-5, 15-18, and 28-31 incorporate the language of independent claims 1, 14, and 27 and add additional novel elements. Therefore, dependent claims 2-5, 15-18, and 28-31 are not anticipated by the Kagan patent application for at least the same reasons as were discussed with respect to claims 1, 14, and 27.

In light of the amendments, Applicants respectfully submit that the rejection of claims 6, 19, and 32 are moot.

Conclusion

For all the above reasons, Applicants submit that the pending claims 1-10, 12-23, 25-36, and 38-39 are patentable over the art of record. Applicants have not added any claims. Nonetheless, should any additional fees be required, please charge Deposit Account No. 50-0585.

The attorney of record invites the Examiner to contact her at (310) 553-7973 if the Examiner believes such contact would advance the prosecution of the case.

Dated: July 20, 2006

By: __/Janaki K. Davda/ __

Janaki K. Davda
Registration No. 40,684

Please direct all correspondences to:

David Victor
Konrad Raynes & Victor, LLP
315 South Beverly Drive, Ste. 210
Beverly Hills, CA 90212
Tel: 310-553-7977
Fax: 310-556-7984